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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE:

BANKRUPTCY CASE

NO. 08-35653 (KRH)

CIRCUIT CITY STORES, INC.,

et al.,

JOINTLY ADMINISTERED

*

Debtors.

CHAPTER 11 PROCEEDING

RESPONSE OF SHERWOOD PROPERTIES, LLC TO LIQUIDATING TRUST'S FOURTH OMNIBUS OBJECTION TO LANDLORD CLAIMS (REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS AND DISALLOWANCE OF CERTAIN INVALID CLAIMS

COMES NOW, Sherwood Properties, LLC, and responds to Liquidating Trust's Fourth Omnibus Objection to Landlord Claims (Reduction of Certain Partially Invalid Claims and Disallowance of Certain Invalid Claims) as follows:

-1-

Claim No. 1226 was amended by Claim No. 12487. Rent for November, 2008 should not be reduced to \$22,224.00. The rent was \$31,748.00. Further, taxes are correct at \$33,290.00.

-2-

Claim No. 12490 is correct as filed. Circuit City Stores, Inc. should provide proof of payment of post-petition taxes, plus three months' rent through March, 2009 when the store closed.

This <u>27th</u> day of May, 2011.

Respectfully submitted,

Walter W. Kelley

KELLEY, LOVETT & BLAKEY, P.C.

Attorney for Sherwood Properties, LLC

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CERTIFICATE OF SERVICE

I, Walter W. Kelley do hereby certify that a true and correct copy of the foregoing RESPONSE OF SHERWOOD PROPERTIES, LLC TO LIQUIDATING TRUST'S FOURTH OMNIBUS OBJECTION TO LANDLORD CLAIMS (REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS AND DISALLOWANCE OF CERTAIN INVALID CLAIMS has been served by pre-paid regular U.S. Mail upon the following parties in interest on the <u>27th</u> day of May, 2011.

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